

Attorney's Docket No.: 10559/008001/P6721

REMARKS

Reconsideration and allowance of the above referenced application are respectfully requested.

Initially, the indication that claims 15-17 are allowed, and that claims 3-4, 9-10, 20 and 28 would be allowed if rewritten into independent form is appreciatively noted. These claims are retained herein.

Claims 1-2, 5-8, 11-14, 18, 19, 21-27, 29 and 30 stand rejected under 35 USC 102(b) as allegedly being anticipated by Cruickshank. This contention is respectfully traversed, and it is respectfully suggested that the rejection does not meet the Patent Office's burden of providing a *prima facie* showing of unpatentability.

Specifically, claims like claim 1 specify two different networks. The first network is a network that carries audio signals and can be, for example, a voice telephone network such as defined by claim 2. The second network, can be, for example, an Internet, see claim 3. According to this system, a communication can be established across the second network using information that is sent over the first network. According to claim 1, the network address for the second network is sent in an encoded form over the first network. That network address is used to establish a network connection on the second network.

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The rejection states that the claims are anticipated by Cruickshank, and that "Cruickshank performs an equivalent function by encoding a computer network address." However, it is respectfully suggested that this is incorrect. Cruickshank describes a PBX which is connected to two different networks, including the normal telephone network and the Internet. The PBX acts as an intelligent switch which selects which of the two networks over which the call should be routed. In other words, the call can be routed over either of the telephone systems for the Internet network. However, this system does not use one network to encode the address for communication over the other network, as claimed. This system as now claimed encodes the computer network address for a second network over the first network.

The claims have been amended to emphasize that the network address which is sent over the first network is used to establish a network connection over the second network. This is not in any way toward or suggested by Cruickshank.

For these reasons, it is respectfully suggested that claim 1 should be allowable along with the claims which depend therefrom.

Claim 11 should be allowable for similar reasons, since it defines establishing a first connection over a voice telephone network, and encoding a network address over that voice

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telephone network. The network address that is sent across the voice telephone network is used to establish a second connection between the first and second locations. As in claim 1, this claim has been amended to emphasize that the message over the voice telephone network is used to establish the data connection. Claim 11 should hence be allowable for these reasons.

Claim 12 has been amended in a similar way and should be allowable for similar reasons.

Claim 13 has also been amended in a similar way, and should also be allowable for similar reasons to those discussed above.

Claim 14 has been amended in similar ways and should hence also be allowable.

Claim 18 defines a similar combination which recites sending a signal from the receiving telephone to the calling telephone across the voice communication network and sending a signal from the calling computer to the receiving computer across the computer network. As described above, this enables two different networks: a voice network and a computer network, to be used simultaneously. As described above, this is in no way taught or suggested by Cruickshank.

Claim 23 similarly defines establishing a connection across a voice communication network, establishing a connection across a computer network, and verifying this connection. As described

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above, Cruickshank does not teach or suggest such features.

Claim 24 should be allowable for similar reasons since Cruickshank does not teach or suggest that the claimed operation of claim 24, and does not teach or suggest using both of voice telephone network and the computer network.

Claim 25 defines a crossbar network with both digital and analog input and output channels. This is in no way taught or suggested by the cited prior art. Claims 26-29 similarly define an audio crossbar switch which is not in any way taught or suggested by Cruickshank.

Finally, claim 30 defines a similar article to that described above and specifically that the computer network address is sent over the voice network to establish a computer connection. As described above, this is in no way taught or suggested by Cruickshank.

In view of the above amendments and remarks, therefore, all of the claims should be in condition for allowance. A formal notice to that effect is respectfully solicited.

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Respectfully submitted,

Date:

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Scott C. Harris
Reg. No. 32,030

PTO Customer No. 20985



Fish & Richardson P.C.
4350 La Jolla Village Drive, Suite 500
San Diego, California 92122
Telephone: (858) 678-5070
Facsimile: (858) 678-5099

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VERSION TO SHOW CHANGES MADE

In the Claims:

The claims have been amended as follows.

1. A method of establishing a network connection, the method comprising:

establishing a connection across a first communication network that carries audio signals;

encoding a computer network address for a [specified] second network different from the first network into an encoded network address and sending the encoded network address across the first network; and

using said network address that is sent over said first network to establish a network connection on said second network.

11. A method of establishing a network connection, the method comprising:

establishing a first connection across a voice telephone network between a first location and a second location;

encoding a computer network address for a specified computer network different from the voice telephone network, into an encoded network address and sending the encoded network

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address across the voice telephone network from the first location to the second location; and

establishing a second connection between the first location and the second location across the computer network using the computer network address sent across the telephone network.

12. A method of establishing a network connection, the method comprising:

establishing a first connection across a voice telephone network between a first location and a second location;

receiving an encoded network address at said second location, from the voice telephone network for a computer network that is different than the voice telephone network;

translating the encoded network address to a computer network address; and

establishing a second connection between the first location and the second location across the computer network using the computer network address received from said voice telephone network.

13. A computer program stored on a computer-readable medium, for establishing a network connection, the computer program including instructions operable to cause a computer to: obtain a computer network address for a computer network;

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send the computer network address across a second network different than the computer network; and

receive a network connection request to establish a network connection across the computer network, and using the computer network address sent across the second network to establish the network connection sent over the second network.

14. A computer program stored on a computer-readable medium, for establishing a network connection, the computer program including instructions operable to cause a computer to:

encode a computer network address for a specified computer network different from a communications network that carries audio signals into an encoded network address and send the encoded network address across the communications network; and

use said computer network address to establish a network connection on said computer network based on said computer network address sent over the communications network.